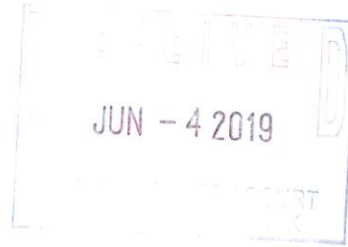


Elizabeth Harrison
1413 N. Vermont Street
Arlington, VA. 22201
Telephone: (571)480-2520
Email: Eharrison165@gmail.com
Pro Se



UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Regards: Chapter 11 LEHMAN BROTHERS HOLDINGS INC., et al., Case No. 08-13555 (SCC)

Debtors. Jointly Administered

Joinder of Elizabeth Harrison to Motion of Rex Wu to Approve Motion for an Order Enforcing the Modified Third Amendment Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors for Purposes of Distributions filed by Rex Wu on April 08, 2019 (Docket # 59614)

Elizabeth Harrison, hereby joins in the motion filed April 08, 2019 (Docket # 59614, the "Motion") by Rex Wu to Approve Motion for an Order Enforcing the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors for Purposes of Distributions filed by Rex Wu on April 08, 2019 (Docket # 59614) and respectfully represents as follows:

1. Like Rex Wu and Rickey M. Gregory, Elizabeth Harrison holds LBHI's Preferred Securities: LEHNQ, LEHKQ and LHHMQ issued by Lehman Brothers Holdings Capital Trust 3, 4 and 6.
2. Just as Rickey M. Gregory, Elizabeth Harrison hereby adopts and incorporates all of the arguments raised in the Motion as if such arguments were set forth herein and asserted by Elizabeth Harrison. As Rex Wu correctly argues in the Motion, the relief requested in the Motion is supported by, among other things, the plain language of the confirmed Plan and applicable bankruptcy law.
3. Elizabeth Harrison reserves all rights to be heard before the Court; via Courtcall at the hearing scheduled for June 19, 2019 at 11:00 am; with regard to the issues raised in the Motion and this Joinder. Elizabeth Harrison reserves all of her rights and remedies, and nothing contained in this Joinder shall constitute an admission by Elizabeth Harrison for any other purpose or a waiver of any rights or remedies available to Elizabeth Harrison. WHEREFORE, Elizabeth Harrison joins in Rex Wu's Motion and Rickey M. Gregory's Joinder and respectfully requests that this Court approve this Motion in its entirety.

Dated June 01, 2019

Respectfully Submitted,
Elizabeth Harrison

By: /s/Elizabeth Harrison

Elizabeth Harrison

1413 N. Vermont Street

Arlington, VA. 22201

Telephone: (571)480-2520

Email: Eharrison165@gmail.com

Pro Se

the Court's decision in *United States v. Galt*, 1998 WL 1000000 (S.D. Cal. 1998), which held that the government's failure to disclose exculpatory evidence in a criminal case constitutes a violation of the defendant's due process rights. The Court in *Galt* found that the government's failure to disclose evidence that the defendant was not the only person who had access to the victim's car constituted a violation of the defendant's due process rights.

The Court in *Galt* also found that the government's failure to disclose evidence that the defendant was not the only person who had access to the victim's car constituted a violation of the defendant's due process rights. The Court in *Galt* found that the government's failure to disclose evidence that the defendant was not the only person who had access to the victim's car constituted a violation of the defendant's due process rights.

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Exhibit A

A) Docket# 8307, page 1775 – Report of Anton R. Valukas, Examiner

“This resolution, however, may be viewed as a unilateral contract for a general guaranty that may be enforced by “anyone to whom it is presented who acts upon it” 6619”

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Footnote 6620: The LBHI 2006 10K (February 13, 2007) and 2007 10K January 29, 2008 refer to the fact that LBHI “guarantee(s) all of the obligations of certain subsidiaries...”

B) Docket # 46304 – Filed September 31, 2014

Response to Order Granting Motion for Authorization for Lehman Brother Special Financing Inc. and Lehman Brother Commercial Corporation to invest disputed claims reserves for claim numbers 66455 and 66476.

Related document(s)[46276] filed by Rickey Gregory. (White, Greg)

Debtor: 08-13555 Lehman Brothers Holdings Inc.

Related Dockets

C) LBHI’s Capital Trust Preferred Securities (CT’s) per their relevant prospectus, and the ECAPS are guaranteed by the June 09, 2005 Guaranty or Board of Directors’ Resolution by way of LBH PLC’s general guaranty. LBHI guaranteed the liabilities, including the ECAPS Limited Partnerships 1 thru 3 subordinate notes, issued by LBH PLC with June 9, 2005 General Guaranty or Board of Directors’ Resolution.

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